

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 16 2015

UNITED STATES OF AMERICA

§
§
§
§
§

BY
DEPUTY _____

v.

No. 6:15-CR- 74
(Judge Schneider)

JEREMY MICHAEL NORTON

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

Violation: 18 U.S.C. § 471
[Making Counterfeited Obligations
of the United States]

On or about November 5, 2015, in Gregg County, in the Eastern District of Texas, defendant **Jeremy M. Norton** with intent to defraud, falsely made, forged, counterfeited, and altered an obligation of the United States, that is, Federal Reserve Notes in the denominations of one hundred dollars (\$100), fifty dollars (\$50), twenty dollars (\$20), ten dollars (\$10), and five dollars (\$5) which he then knew to be falsely made, forged, altered, and counterfeited.

All in violation of 18 U.S.C. § 471.

COUNT 2

Violation: 18 U.S.C. § 472
[Uttering Counterfeited
Obligations of the United States]

On or about October 12, 2015, in Gregg County, in the Eastern District of Texas, defendant **Jeremy M. Norton**, with intent to defraud, did pass, utter, and publish to an employee of Papacita's Mexican Restaurant located at 305 W. Loop 281, Longview, Texas, falsely made, forged, altered, and counterfeited obligations of the United States; that is, a Federal Reserve Note in the denomination of one hundred dollars (\$100), which he then knew to be falsely made, forged, altered, and counterfeited.

All in violation of 18 U.S.C. § 472.

COUNT 3

Violation: 18 U.S.C. § 472
[Uttering Counterfeited
Obligations of the United States]

On or about October 28, 2015, in Gregg County, in the Eastern District of Texas, defendant **Jeremy M. Norton**, with intent to defraud, did pass, utter, and publish to an employee of Leon's Steakhouse & Saloon located at 2112 S. Eastman Road, Longview, Texas, falsely made, forged, altered, and counterfeited obligations of the United States; that is, Federal Reserve Notes in the denomination of twenty dollars (\$20), which he then knew to be falsely made, forged, altered, and counterfeited.

All in violation of 18 U.S.C. § 472.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

18 U.S.C. §§ 492, 982(a)(2) and 28 U.S.C. § 2461

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States any counterfeiting paraphernalia, including but not limited to the following:

- HP Deskjet 2540 printer (Serial No. CN53K57361).
- HP Envy 7640 multifunction printer/scanner (Serial No. TH52R2515G).
- Black Sandisk Cruzer 8GB flash drive.
- Red and black generic flash drive.
- Miscellaneous counterfeiting paraphernalia (including black Westcott paper cutter, blank resume paper, blank copy paper).

Further, pursuant to 18 U.S.C. § 982(a)(2) and 28 U.S.C. § 2461, the defendant shall forfeit to the United States all property, real or personal, involved in or traceable to property involved in the offense, including proceeds obtained directly or indirectly from the offense.

If any property subject to forfeiture, as a result of any act or omission by the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

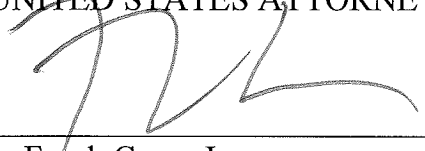
the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property.

A TRUE BILL

12/16/15
Date:


GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY


L. Frank Coan, Jr.
Assistant United States Attorney
Bar No. 170966 (Georgia)
110 N. College, Suite 700
Tyler, Texas 75702
(903) 590-1400
(903) 590-1439 Fax
frank.coan@usdoj.gov

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NOTICE OF PENALTY

COUNT 1

VIOLATION: 18 U.S.C. § 471

Imprisonment for not more than 20 years; a fine of not more than \$250,000; a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00

COUNTS 2-3

VIOLATION: 18 U.S.C. § 472

Imprisonment for not more than 20 years; a fine of not more than \$250,000; a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT: \$100.00